



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

SFUND RECORDS CTR
2073993

July 19, 2005

Jeffery C. Morris, PE
CH2M Hill
156 Grand Avenue
Suite 1000
Oakland, CA 94612

Re: December 3, 2004 letter regarding Application for Risk Based Disposal Approval for Polychlorinated Biphenyls at Building 840 UL#01 Within Investigation Area C3 in the Eastern Early Transfer Parcel, Mare Island, Vallejo, California.

Dear Mr. Morris:

EPA has received your application for risk based disposal approval of December 3, 2004. You seek a determination from EPA, in accordance with 40 CFR 761.61(c) and paragraph 6(a) of the Consent Agreement and Final Order (CA/FO) between the EPA and the Navy, City of Vallejo and Lennar Mare Island, that the sites referenced above satisfy the standards for a risk-based disposal approval, and that no further action is required.

Building 840 is an electrical distribution center near Dry Dock #3, which houses four transformers and two rocker arms. PCBs currently remain in the transformer oil below 2 parts per million. PCBs were detected in one of six samples at a concentration of 3.9 mg/kg.

CH2M Hill estimates the excess cancer risk from exposure to PCBs ranges from 5×10^{-6} and 7×10^{-7} , and the non-cancer hazard index to be below 1 under an industrial setting. EPA finds that the remaining PCB concentrations are in compliance with the alternative substantive cleanup requirements (SCRs) of paragraph 8(b)(2) of the CA/FO for concrete floors in industrial areas, where maximum concentrations do not exceed 10 mg/kg and the average does not exceed 5 mg/kg, with a deed restriction limiting the building to industrial use. We are therefore making this determination under paragraph 8(b)(2) of the CA/FO rather than under 40 CFR 761.61(c).

You did not specify that you intend to place an industrial use deed restriction on the parcel in your December 3, 2004 letter. EPA cannot grant a 40 CFR 761.61(c) approval for these sites until the deed restriction is approved by EPA and recorded. It would also be prudent to remove all PCB contaminated oil prior to sale of the property.

In addition, EPA has the following technical comment. On page 4 of your letter you state that dermal contact is not a likely exposure pathway for PCBs in concrete floors. EPA does not agree. While dermal contact with concrete floors may be unlikely, there have been reported cases of workers contaminating the floors of their homes with materials adhering to their shoes that they picked up in the workplace, to which young children in the home may be exposed. Please remove this assumption from future risk assessments.

Please feel free to contact Carolyn d'Almeida if you have any questions about this letter, or Michele Benson at (415) 972-3918 to discuss the deed restriction.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen Johnson".

Kathleen Johnson
Chief
Federal Facility and Site Cleanup Branch

c.c. Henry Chui, DTSC